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April 26, 2021

FILED BY ECF

The Honorable Vernon S. Broderick
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

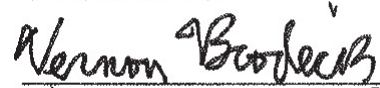
Re: United States v. Confesor, 20-CR-00059-VSB

Dear Judge Broderick:

I am appointed counsel under the Criminal Justice Act for Mr. Minaya-Rodriguez in the case referenced above and respectfully submit this letter on his behalf to request a modification of his bail such that the home detention and GPS monitoring conditions are removed. On February 20, 2020, the order entered by Magistrate Judge Moses setting the conditions of bail provided for the following:

- a personal recognizance bond in the amount of \$100,000;
- the bond to be co-signed by three financially responsible persons (which was modified to two co-signers on March 17, 2020) acceptable to the United States Attorney's Office for the Southern District of New York ("USAO");
- surrender of passport and any travel documents which defendant now holds;
- travel restrictions to the Southern and Eastern Districts of New York, the District of Maryland and points in between solely for purposes of transit;
- pretrial supervision in the District of Maryland as directed by Pretrial Services Agency;
- no contact with any of Mr. Minaya-Rodriguez's co-defendants, direct or indirect, except in the presence of counsel; and

SO ORDERED:



HON. VERNON S. BRODERICK 5/5/2021
UNITED STATES DISTRICT JUDGE

- home detention enforced by GPS monitoring with the further condition that defendant seek and maintain verifiable and lawful employment at a stationary workplace.

After meeting these requirements, Mr. Minaya-Rodriguez was released on March 24 and has been confined to the residence that he shares with his girlfriend, Belkis Castillo. Mr. Minaya-Rodriguez has complied with each of his bail conditions since that time. Mr. Minaya-Rodriguez has been unable to find suitable employment, to date, and as a result, he has been confined inside of a small apartment for the past twelve months. This continued physical isolation has negatively impacted his mental health and he continues to feel increasingly anxious and depressed.

On February 11, 2021, this Court ordered that defendant Daisy Confesor's bail be modified to remove the conditions of curfew and GPS monitoring. We respectfully ask the same for Mr. Minaya-Rodriguez. Mr. Minaya-Rodriguez believes that amending the bail conditions in this manner will significantly improve his physical and mental health, as well as increase his likelihood of obtaining employment. This, in turn, would allow Mr. Minaya-Rodriguez to assist Ms. Castillo with the maintenance, expenses and upkeep of the residence by being able to run errands and complete other tasks outside of the residence when Ms. Castillo is at work.

Thank you for the Court's attention and consideration of this request.

Respectfully submitted,

/s/ Victor L. Hou

Victor L. Hou

cc: Juliana Murray, Esq., AUSA
Jonathan Lettieri, Supervising Officer, PTS